

POLREP 01ALLIED CHEMICAL WORKS SITE

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ATTN: RRC, C. KLEEMAN

I. SITUATION (AS OF 1200 23 JANUARY 1998)
EVENT: INTEGRATED REMOVAL ASSESSMENT

A. THE ALLIED CHEMICAL WORKS SITE IN FRONT ROYAL, VIRGINIA, MANUFACTURED SULPHURIC ACID FROM APPROXIMATELY 1945 TO 1986 WHEN IT CEASED MANUFACTURING OPERATIONS. AVTEX FIBERS, INC. WHICH OPERATED A RAYON MANUFACTURING PLANT ADJACENT TO THE ALLIED PLANT, PURCHASED THE FACILITY IN 1986 AND USED IT FOR ACID STORAGE PURPOSES UNTIL 1989 WHEN AVTEX CEASED OPERATIONS IN FRONT ROYAL. THE SITE IS NOW ABANDONED.

B. A PRELIMINARY SITE ASSESSMENT WAS CONDUCTED BY EPA IN 1984, WHEN THE ALLIED FACILITY WAS IN OPERATION. A SITE INVESTIGATION WAS CONDUCTED IN 1988 BY THE COMMONWEALTH OF VIRGINIA WHEN AVTEX STORED ACID AT THE FACILITY. ACIDIC DISCHARGES WERE NOTED IN 1988 ALONG WITH LOW LEVELS OF PCB AND METAL CONTAMINATION.

C. A STEEL PIPELINE WAS USED TO TRANSFER ACID FROM THE ALLIED FACILITY TO THE AVTEX FACILITY. THIS PIPELINE WAS FOUND TO BE LEAKING RESIDUAL ACID IN 1997 AND WAS REMOVED FROM AVTEX UP TO THE FENCE SURROUNDING THE PROCESSING AREA OF ALLIED AS PART OF ONGOING REMOVAL ACTIVITIES AT THE AVTEX FIBERS NPL SITE.

D. REMOVAL ASSESSMENT ACTIVITIES WERE PERFORMED AT THE SITE ON 08 DECEMBER 1997 AND 20-22 JANUARY 1998 IN ACCORDANCE WITH THE NCP.

II. ACTIONS

A. THE OSC REQUESTED AND RECEIVED PERMISSION TO ACCESS THE ALLIED FACILITY FROM THE CURRENT SITE OWNER (THE AVTEX BANKRUPTCY TRUSTEE) 08 DECEMBER 1997.

B. OSC TOWLE AND OSC ENGLISH ACCESSED THE FACILITY 08 DECEMBER 1997. ONE GATE WAS FOUND UNLOCKED. LIQUID IN ONE TANK WAS FOUND TO HAVE A pH OF 14. THE pH OF WATER DISCHARGING FROM THE NORTH OF THE SITE WAS FOUND TO BE 1 OR 2. THE DRAINAGE DITCH THROUGH WHICH THE ACIDIC WATER TRAVELED DISCHARGES TO A

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COLLECTION POND. THIS "COLLECTION" POND WAS THE LOCATION OF pH ADJUSTMENTS DURING FORMER SITE OPERATIONS. THE DITCH WAS FOUND TO BE DAMMED AND A LARGE POOL OF ACIDIC WATER HAD ACCUMULATED.

C. THE OSC REPORTED THE FINDINGS TO AVTEX TRUSTEE AND FMC CORPORATION WASTE WATER PLANT CONTRACTOR SINCE RECENT WORK BY SUBCONTRACTORS INSTALLING A NEW POWER LINE ON BEHALF OF FMC MAY HAVE CAUSED THE DAM. THE DAM WAS SUBSEQUENTLY REMOVED.

D. THE OSC TASKED THE SATA CONTRACTOR TO CONDUCT THE SAMPLING PHASE OF A REMOVAL ASSESSMENT 20 THROUGH 22 JANUARY 1998. THE SAMPLING PLAN WAS COMPLETED 31 DECEMBER 1997. THE OWNER AGAIN APPROVED ACCESS FOR THESE ACTIVITIES.

E. AIR MONITORING CONDUCTED DURING A PRELIMINARY WALK THROUGH (20 JANUARY 1998) DETECTED NO LEVELS ABOVE BACKGROUND (RADIATION AND OVA).

F. SURFACE WATER EXITING THE SITE THROUGH THE NORTHERN PERIMETER FENCE HAS A pH LESS THAN 2 IN THE DRAINAGE DITCH. THE WATER pH RISES TO 4 IN THE "COLLECTION" POND INTO WHICH THE DITCH EMPTIES. THE pH RISES TO 7 IN THE SMALL TRIBUTARY TO THE SHENANDOAH RIVER INTO WHICH THE "COLLECTION" POND DRAINS. THE pH OF THE SEDIMENT IN THE DRAINAGE DITCH AND POND IS LESS THAN 3.5.

G. NUMEROUS DEAD TADPOLES WERE OBSERVED IN THE "COLLECTION" POND.

H. A TOTAL OF 63 TANKS WERE IDENTIFIED WITHIN THE FENCED AREA OF THE SITE. ONE TANK WAS DETERMINED TO HAVE A HIGH pH LIQUID (THIS TANK WEEPS FROM ONE OF THE BRACKETS). SEVERAL TANKS WERE IDENTIFIED AS CONTAINING SOLID RESIDUES OF UNKNOWN MATERIALS. SEVERAL SECTIONS OF PIPE WERE OBSERVED TO BE FULL OF RESIDUAL MATERIALS.

I. A SMALL LABORATORY EXISTS IN ONE OF THE ONSITE BUILDINGS. SMALL CONTAINERS OF SULPHURIC ACID, VARIOUS METAL POWDERS, AMMONIUM HYDROXIDE, POTASSIUM PERMANGANATE, AND OTHER ITEMS, INCLUDING MERCURY ITEMS, WERE LOCATED WITHIN.

J. VARIOUS BUILDINGS ON THE SITE CONTAINED DETERIORATED BAGS OF CAUSTIC SODA, DRUMS OF OILY LIQUIDS, SMALL CONTAINERS OF

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PAINTS AND STAINS, AS WELL AS VARIOUS MAINTENANCE-RELATED ITEMS SUCH AS LUBRICANTS. A 250-GALLON FUEL TANK IN ONE SHED IS APPARENTLY LEAKING AS EVIDENCED BY STAINING. A POSSIBLE STORAGE TANK IS ALSO LOCATED NEXT TO THE COOLING TOWER.

K. NUMEROUS SAMPLES OF WATER, SOIL, SEDIMENT, AND WASTE, AS WELL AS A SAMPLE OF DETERIORATED TANK INSULATION, WERE SENT FOR LABORATORY ANALYSIS.

III. FUTURE ACTIONS

A. COMPLETE A TRIP REPORT SUMMARIZING ONSITE ACTIVITIES.

B. ASBESTOS AND RCRA WASTE ANALYTICAL DATA IS EXPECTED FROM PACE, INC. ON OR ABOUT 13 FEBRUARY 1998.

C. ANALYTICAL RESULTS OF ENVIRONMENTAL SAMPLES (SOIL, SEDIMENT, WATER) ARE EXPECTED ON OR ABOUT 6 APRIL 1998 FROM AMERICAN ANALYTICAL AND TECHNICAL SERVICES AND SENTINEL, INC.

D. THE OSC SHALL DETERMINE THE NEED FOR FUTURE ACTIONS PURSUANT TO THE NCP.

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